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November 10, 2023

The Honorable Martin Glenn
United States Bankruptcy Court
for the Southern District of New York
One Bowling Green
New York, NY 10004-1408500

Re: In re: Three Arrows Capital, Ltd., Case No. 22-10920; Jennifer Pollan

Dear Chief Judge Glenn:

This Firm represents Genesis Global Holdco, LLC its affiliated debtors in possession in the jointly-administered proceedings captioned *Genesis Global Holdco, LLC et. al* (Case No. 23-10063) (SHL) pending before the Honorable Sean H. Lane (the “Genesis Chapter 11 Cases”). As the Court may be aware, the joint liquidators of the above-captioned debtors (“3AC”) have filed proofs of claim in the Genesis Chapter 11 Cases, which have been the subject of significant motion practice and discovery over the past several months.

I write to provide notice to the Court and to the applicable parties that one of your former law clerks, Jennifer Pollan, has just re-joined Cleary Gottlieb Steen & Hamilton LLP (“Cleary Gottlieb”) as an associate in our New York office. From October 3, 2022 to September 29, 2023, Ms. Pollan clerked in your Chambers. We understand that during her clerkship, Ms. Pollan assisted in drafting opinions and participated in discussions about decision making and Ms. Pollan was involved in 3AC-related matters during the court’s resolution of certain contested legal issues from October 3, 2022 to September 29, 2023 (Ms. Pollan’s “Prior Work”).

The Honorable Martin Glenn, p. 2

In accordance with Rule 1.12 of the New York Rules of Professional Conduct (“Rule 1.12”), we are screening Ms. Pollan from any participation in the Genesis Chapter 11 Cases or any other matters concerning 3AC.. We have concluded that Ms. Pollan’s Prior Work rises to the level of personal and substantial involvement within the meaning of Rule 1.12, and as such, we have established screening procedures to ensure that there is no flow of information about 3AC between Ms. Pollan and the Cleary Gottlieb team working on the Genesis Chapter 11 Cases and any other 3AC-related matter. All Firm attorneys working on the Genesis Chapter 11 Cases and any other 3AC-related matter have been instructed that they should not communicate with Ms. Pollan about their work on such matters or share any confidential information related thereto with Ms. Pollan. Similarly, Ms. Pollan has been instructed that she is not to work on the Genesis Chapter 11 Cases or any other 3AC-related matter or communicate with that team concerning such matters.

Finally, as an associate, none of Ms. Pollan’s compensation will be apportioned from or related to fees from the Genesis Chapter 11 Cases or any other 3AC-related matter..

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Luke A. Barefoot", written in a cursive style.

Luke A. Barefoot